

**REMARKS**

In the Office Action, the Examiner rejects claims 1-3, 5-29, and 31-33 under 35 U.S.C. § 103(a) as unpatentable over FORD et al. (U.S. Patent Application Publication No. 2005/0289140) and DOGANATA et al. (U.S. Patent Application Publication No. 2003/0220913). Applicants respectfully traverse this rejection.<sup>1</sup> Claims 1-3, 5-29, and 31-33 remain pending.

At the outset, the Examiner appears to rely solely on FORD et al. for the rejection of independent claims 1, 8-11, and 27-29. For example, with regard to claim 1, the Examiner states that FORD et al. does not disclose that the identified source is a news source and further states that DOGANATA et al. discloses this feature (Office Action, pg. 4). However, claim 1 does not recite that the identified source is a news source. Applicants respectfully request clarification of the rejection of the independent claims.

Claims 1-3, 5-29, and 31-33 stand rejected under 35 U.S.C. § 103(a) as unpatentable over FORD et al. in view of DOGANATA et al. Applicants respectfully traverse this rejection.

Independent claim 1 is directed toward a method performed by one or more devices. The method includes receiving a list of links; identifying, for at least one of the links, a source with which the at least one link is associated; and ranking the list of links based at least in part on a quality of the identified source, the ranking including: retrieving a source rank value for each identified source, the source rank value being

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<sup>1</sup> As Applicants' remarks with respect to the Examiner's rejections are sufficient to overcome these rejections, Applicants' silence as to assertions by the Examiner in the Office Action or certain requirements that may be applicable to such rejections (e.g., whether a reference constitutes prior art, motivation to combine reference, assertions as to dependent claims, etc.) is not a concession by Applicants that such assertions are accurate or such requirements have been met, and Applicants reserve the right to analyze and dispute such assertions/requirements in the future.

based at least in part on one or more of a number of articles produced by the identified source during a first time period, an average length of an article produced by the identified source, an amount of coverage that the identified source produces in a second time period, a breaking news score, network traffic to the identified source, a human opinion of the identified source, circulation statistics of the identified source, a size of a staff associated with the identified source, a number of bureaus associated with the identified source, a number of original named entities in a group of articles associated with the identified source, a breadth of coverage by the identified source, a number of different countries from which traffic to the identified source originates, or a writing style used by the identified source. FORD et al. and DOGANATA et al. do not disclose or suggest this combination of features.

For example, FORD et al. and DOGANATA et al., whether taken alone or in any reasonable combination, do not disclose or suggest retrieving a source rank value for each identified source, the source rank value being based at least in part on one or more of a number of articles produced by the identified source during a first time period, an average length of an article produced by the identified source, an amount of coverage that the identified source produces in a second time period, a breaking news score, network traffic to the identified source, a human opinion of the identified source, circulation statistics of the identified source, a size of a staff associated with the identified source, a number of bureaus associated with the identified source, a number of original named entities in a group of articles associated with the identified source, a breadth of coverage by the identified source, a number of different countries from which traffic to the identified source originates, or a writing style used by the identified source. The Examiner appears

to rely on paragraph 0033 of FORD et al. as allegedly disclosing this feature (Office Action, pg. 4). Applicants respectfully disagree with the Examiner's interpretation of FORD et al.

At paragraph 33, FORD et al. discloses:

The query server 140 includes a category ranking process 150 that prioritizes, by category, the results of searches across all of the various databases 141-147. The prioritization scheme is based upon an assessment of the significance of each category to the search query submitted by the user. The query server 140 also includes a spell checker 152 for detecting and correcting misspellings in search attempts, and a search tool 154 capable of generating search results from a database (e.g. the Books database 141) in response to a query submitted by a user. The search tool 154 prioritizes the items within a search result using different criteria depending upon the database used for the search. One approach, used for the Product Spider database 147, ranks the search result items through the well known "term frequency inverse document frequency" (TFIDF) approach, in which the weighting applied to each term of a multiple-term query is inversely related to the term's frequency of appearance in the database. In other words, the term in a query that appears least often in a database (e.g. the Product Spider database 147) is considered to be the most discriminating term in the query, and thus is given the greatest weight by the search tool 154. Algorithms for implementing this approach are well known and are commonly available in software development kits associated with commercial search engines such ALTAVISTA and EXCITE.

This section of FORD et al. discloses that the query server 140 includes a category ranking process 150 that prioritizes, by category, the results of searches across all of the various databases 141-147. The prioritization scheme is based upon an assessment of the significance of each category to the search query submitted by the user. This section of FORD et al. does not disclose or suggest retrieving a source rank value for each identified source, the source rank value being based at least in part on one or more of a number of articles produced by the identified source during a first time period, an average length of an article produced by the identified source, an amount of coverage that the identified source produces in a second time period, a breaking news score, network traffic to the

identified source, a human opinion of the identified source, circulation statistics of the identified source, a size of a staff associated with the identified source, a number of bureaus associated with the identified source, a number of original named entities in a group of articles associated with the identified source, a breadth of coverage by the identified source, a number of different countries from which traffic to the identified source originates, or a writing style used by the identified source, as required by claim 1.

For at least the foregoing reason, Applicants submit that claim 1 is patentable over FORD et al. and DOGANATA et al., whether taken alone or in any reasonable combination.

Claims 2, 3, and 5-7 depend from claim 1. Therefore, these claims are allowable over FORD et al. and DOGANATA et al., whether taken alone or in any reasonable combination, for at least the reasons given above with respect to claim 1. Moreover, these claims recite additional features not disclosed or suggested by FORD et al. and DOGANATA et al.

For example, claim 6 recites that the links include links to on-line news articles. The Examiner relies on reference number 380 in Fig. 3 and paragraph 0056, which describes reference number 380, of FORD et al. as allegedly disclosing this feature (Office Action, pg. 6). Applicants respectfully disagree with the Examiner's interpretation of FORD et al.

In paragraph 0056, FORD et al. discloses:

Immediately below the Additional Matches section 350, the results page displays the Related Products section 380. This section displays the search results generated from application of the query to the unaffiliated merchant database, that is, to the Product Spider database 147. In the preferred embodiment, no top-level results are displayed for this category. Instead, the results are accessible from the All Products search results page 300 via a hypertext link labeled "Related

Products" 380. The search of the Product Spider database 147 preferably does not take place simultaneously with the searches of the other databases 141-146. Rather, the Product Spider search is initiated by the user's selection of the Related Products hypertext link 380, instead of by the user's selection of the search initiation button 240.

This section of FORD et al. discloses a related products section 380 that displays the search results generated from application of a query to an unaffiliated merchant database. This section of FORD et al. does not disclose or suggest the links include links to on-line news articles, as required in claim 6.

For at least this additional reason, Applicants submit that claim 6 is patentable over FORD et al. and DOGANATA et al., whether taken alone or in any reasonable combination.

Independent claims 8-11 and 27-29 recite features similar to, yet possibly of different scope than, features recited above with respect to claim 1. Therefore, Applicants submit that claims 8-11 and 27-29 are patentable over FORD et al. and DOGANATA et al., whether taken alone or in any reasonable combination, for reasons similar to the reasons given above with respect to claim 1.

Claim 32 depends from claim 8. Therefore, claim 32 is allowable over FORD et al. and DOGANATA et al., whether taken alone or in any reasonable combination, for at least the reasons given above with respect to claim 8. Moreover, claim 32 recites additional features not suggested by FORD et al. and DOGANATA et al.

For example, claim 32 recites features similar to, yet possibly of different scope than, features recited above with respect to claim 6. Therefore, Applicants submit that claim 32 is are patentable over FORD et al. and DOGANATA et al., whether taken alone or in any reasonable combination, for reasons similar to the reasons given above with

respect to claim 6.

Claim 33 depends from claim 9. Therefore, claim 33 is allowable over FORD et al. and DOGANATA et al., whether taken alone or in any reasonable combination, for at least the reasons given above with respect to claim 9. Moreover, claim 33 recites additional features not suggested by FORD et al. and DOGANATA et al.

For example, claim 33 recites features similar to, yet possibly of different scope than, features recited above with respect to claim 6. Therefore, Applicants submit that claim 33 is patentable over FORD et al. and DOGANATA et al., whether taken alone or in any reasonable combination, for reasons similar to the reasons given above with respect to claim 6.

Claims 12-26 depend from claim 11. Therefore, these claims are allowable over FORD et al. and DOGANATA et al., whether taken alone or in any reasonable combination, for at least the reasons given above with respect to claim 11. Moreover, these claims recite additional features not suggested by FORD et al. and DOGANATA et al.

For example, claim 15 recites normalizing each metric value in the plurality of metric values, and adding the plurality of normalized metric values to obtain the quality value. The Examiner relies on reference numbers 350 and 380 and paragraphs 0041 and 0048 (which describes reference numbers 350 and 380) of FORD et al. as allegedly disclosing this feature. Applicants respectfully disagree with the Examiner's interpretation of FORD et al.

At paragraph 0041, FORD et al. discloses:

If the query is submitted to a single category, the search engine will present to the user a query results page (or multiple pages linked by hypertext, if the search

finds a large number of items) containing a list of items matching the query. The search results page includes, for each item found, a hypertext link to additional web pages containing, among other things, product information about the item.

This section of FORD et al. discloses that, if a query is submitted to a single category, the search engine will present to the user a query results page containing a list of items matching the query. This section of FORD et al. does not disclose or suggest normalizing each metric value in the plurality of metric values, and adding the plurality of normalized metric values to obtain the quality value, as required by claim 15.

At paragraph 0048, FORD et al. discloses:

FIG. 3 illustrates the general format of a search results page 300 of the AMAZON.COM web site 130 generated and displayed to the user in response to an "All Products" search on the query "Mark Twain." The results page 300 displays the search results in three separate sections: a "Top Search Results" section 305, an "Additional Matches" section 350, and a "Related Products" section 380.

This section of FORD et al. discloses that the results page displays the search results in three separate sections: a "Top Search Results" section 305, an "Additional Matches" section 350, and a "Related Products" section 380. This section of FORD et al. does not disclose or suggest normalizing each metric value in the plurality of metric values, and adding the plurality of normalized metric values to obtain the quality value, as required by claim 15.

For at least this additional reason, Applicants submit that claim 15 is patentable over FORD et al. and DOGANATA et al., whether taken alone or in any reasonable combination.

Claim 31 depends from claim 29. Therefore, claim 31 is allowable over FORD et al. and DOGANATA et al., whether taken alone or in any reasonable combination, for at least the reasons given above with respect to claim 29. Moreover, claim 31 recites

additional features not suggested by FORD et al. and DOGANATA et al.

For example, claim 31 recites features similar to, yet possibly of different scope than, features recited above with respect to claim 6. Therefore, Applicants submit that claim 31 is are patentable over FORD et al. and DOGANATA et al., whether taken alone or in any reasonable combination, for reasons similar to the reasons given above with respect to claim 6.

In view of the foregoing remarks, Applicants respectfully request withdrawal of the outstanding rejections and the timely allowance of this application.

To the extent necessary, a petition for an extension of time under 37 C.F.R. § 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account No. 50-1070 and please credit any excess fees to such deposit account.

Respectfully submitted,

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